

W. DAVID DENTON  
THOMAS J. KEULER  
WILLIAM E. PINKSTON  
LISA H. EMMONS  
DAVID L. KELLY  
THEODORE S. HUTCHINS\*  
GLENN D. DENTON\*  
STACEY A. BLANKENSHIP  
MELISSA D. YATES\*  
NEAL D. OLIPHANT  
DOUGLAS R. MOORE

\*Also Licensed To Practice in Illinois

# DENTON & KEULER

ATTORNEYS AT LAW  
*A Limited Liability Partnership*

PADUCAH BANK BUILDING SUITE 301  
555 JEFFERSON STREET  
P.O. BOX 929  
PADUCAH, KENTUCKY 42002-0929

TELEPHONE  
(270) 443-8253

FACSIMILE  
(270) 442-6000

REAL ESTATE FACSIMILE  
(270) 442-6034

WEB SITE: [www.dklaw.com](http://www.dklaw.com)

February 14, 2008

MS. BETH O'DONNELL  
EXECUTIVE DIRECTOR  
KENTUCKY PUBLIC SERVICE COMMISSION  
211 SOWER BLVD.  
FRANKFORT KY 40602

RECEIVED  
FEB 20 2008  
PUBLIC SERVICE  
COMMISSION

***Re: Jackson Purchase Energy Corporation  
2007-00116***

Dear Ms. O'Donnell:

Please find enclosed an original and ten (10) copies of Jackson Purchase Energy Corporation's Motion for Extension of Time to Answer the Second Request for Data from Commission Staff.

I have enclosed an additional copy for file-stamping, which I would ask that you return to me in the enclosed self-addressed, stamped envelope. Should you need any further information from me regarding this filing, please do not hesitate to contact me.

Sincerely,



Melissa D. Yates  
Attorney for Jackson Purchase Energy Corporation

98629

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
FEB 20 2008  
PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

JACKSON PURCHASE ENERGY )  
CORPORATION, )  
)  
)  
)

CASE NO. 2007-00116

**JPEC'S MOTION FOR EXTENSION OF TIME TO ANSWER THE SECOND  
REQUEST FOR DATA FROM COMMISSION STAFF**

Jackson Purchase Energy Corporation ("JPEC"), by and through its counsel, hereby moves for an extension of time to file its response to the Second Request for Data from Commission Staff. As grounds therefore, JPEC states as follows:

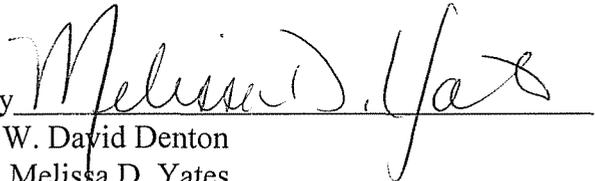
On Monday, February 11, 2008 and Tuesday, February 12, 2008, Western Kentucky was struck by a winter storm including sleet and ice. That storm resulted in the loss of power to a substantial number of JPEC's members. The specifics of this event have been reported to the PSC as required and are well documented. The administrative staff necessary to respond to the data requests have been working long hours and assisting with the restoration of power to JPEC's members in any way they are able. Because of the extraordinary effort and resources necessary to restore power to its members, JPEC personnel have been unable to meet with and properly discuss this matter with its counsel. Therefore, JPEC requires additional time to develop its responses to the staff's second set of data requests.

Wherefore, JPEC respectfully requests that it be allowed to have up to and including February 29, 2008 , to file its Responses to the Second Data Request of the Commission Staff, which is 10 days following the original expected due date of February 19,

2008. Counsel for JPEC has consulted with the Attorney General's office and the Attorney General's office has stated it has no objection to this motion.

Respectfully submitted,

DENTON & KEULER  
P.O. Box 929  
Paducah, KY 42002-0929  
Tele: 270-443-8253  
Facsimile: 270-442-6000

By   
W. David Denton  
Melissa D. Yates

ATTORNEYS FOR JACKSON PURCHASE  
ENERGY CORPORATION

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by mailing via U.S. Mail and via facsimile transmission to:

MS BETH O'DONNELL EXEC DIR  
PUBLIC SERVICE COMMISSION  
211 SOWER BLVD  
P O BOX 615  
FRANKFORT KY 40602  
Fax No.: 502-564-3460

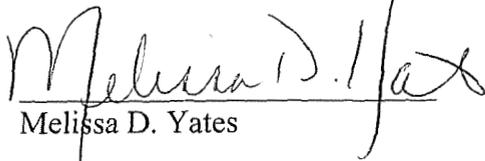
True and correct copies of the  
foregoing have been mailed to:

HON ANITA MITCHELL  
PUBLIC SERVICE COMMISSION  
730 SCHENKEL LANE  
P O BOX 615  
FRANKFORT KY 40602

and

DENNIS G HOWARD  
LARRY COOK  
OFFICE OF THE ATTORNEY GENERAL  
1024 CAPITAL CENTER DRIVE  
SUITE 200  
FRANKFORT KY 40601-8204

on this 14<sup>th</sup> day of February, 2008.

  
Melissa D. Yates

cc: Kelly Nuckols @ Jackson Purchase Energy Corporation